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**ChargePoint Comments 2020-2023 CTP Investment Plan Update**

*Additional submitted attachment is included below.*



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**California Energy Commission  
Docket #19-ALT-01  
2020-2023 Investment Plan Update  
Clean Transportation Program**

Public Comments  
Submitted by  
ChargePoint, Inc.  
March 30, 2020

ChargePoint appreciates the opportunity to provide comments on the 2020-2023 Investment Plan Update for the Clean Transportation Program, Draft Staff Report<sup>1</sup>. We commend the California Energy Commission (Commission) for proposing a multiyear funding plan and frontloading light-duty, electric vehicle (EV) charging infrastructure investments. This approach and targeted investment provides stakeholders increased certainty in achieving the goals of Executive Order B-48-18 which sets a directive to install 250,000 zero-emission vehicle charging ports, including 10,000 DC fast charging ports, in California by 2025. ChargePoint believes the Commission's proposed approach will compliment and accelerate efforts by other public agencies and the private sector.

ChargePoint has been a proud partner of the Commission's since 2009 and is poised to support the goals of the Clean Transportation Program into the future. ChargePoint is the leading EV charging network in the world, with solutions for every place EV drivers charge: at home, work, around town and on the road. With more than 111,000 independently owned public and semi-public charging spots, ChargePoint is the only charging technology company on the market that designs, develops and manufactures hardware and software solutions across every use case. ChargePoint drivers have completed more than 75 million charging sessions, saving upwards of 89 million gallons of gasoline and driving more than 2.1 billion gas-free miles. For more information, visit [www.chargepoint.com](http://www.chargepoint.com).

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<sup>1</sup> [Draft Staff Report- 2020-2023 Investment Plan Update for the Clean Transportation Program](#)



### **California Electric Vehicle Infrastructure Project (CALeVIP)**

ChargePoint commends the Commission for CALeVIP which largely achieves its goals to provide a mechanism that accelerates light-duty EV charging installation, reporting, and funding processes. CALeVIP has evolved considerably since its 2017 launch with the Fresno County Incentive Project (FCIP) which saw slow uptake and limited participation. Subsequent programs have been incredibly successful, becoming oversubscribed in a matter of days while attracting a diverse portfolio of applicants including municipalities, hospitals, workplaces, gas stations, shopping malls, and third-party owner operators. We encourage the Commission maintain this momentum in future programs and advise against any modifications that may deter participation such as requiring applicants to incur out of pocket expenses prior to receiving a confirmation of funds reserved from CALeVIP.

To make CALeVIP even more effective, we encourage the Commission to consider implementing project milestones across all future programs. We believe implementing 2-3 milestones through project implementation would help ensure projects move forward as quickly as possible without slowing program uptake or site host diversity. ChargePoint offers the following milestones as an example:

1. Submit a paid design invoice and permit application to the CALeVIP website
2. Submit a utility assessment to the CALeVIP website
3. Submit a paid EV charging equipment invoice to the CALeVIP website

Milestones should be time based (e.g., 60 days from funds reserved confirmation). Extensions to fulfill milestones should be granted on a case-by-case basis. If an applicant is unable to fulfill a project milestone their project should be canceled and their reserved funds should be made available for another CALeVIP applicant. Implementing simple project milestones will help ensure projects move forward as quickly as possible or provide a quicker patch to project cancellation and reallocation of funds to a more suitable project.

In light of the technical issues experienced during the launch of the San Joaquin Valley Incentive Project, ChargePoint recommends that the disadvantaged community verification process occur after a CALeVIP application has been accepted. With the ever increasing popularity of CALeVIP and uncertainty around traffic through the CALeVIP



system we recommend removing potential bottlenecks in the technology by minimizing the amount of verification that occurs upon initial application submission.

### **Permit Streamlining Assistance**

Despite the law established by AB 1236 (Chou) in 2015, permitting remains one of the greatest barriers to efficient, cost-effective EV charging infrastructure deployment. Many jurisdictions are not in compliance with AB 1236 and some jurisdictions that have adopted streamlined permitting processes are slow to implement those policies in practice. In many cases, the permitting process is left to interpretation by individuals, adding time and cost to the installation process. We appreciate complimentary efforts being led by GO-Biz to educate cities on AB 1236 requirements but recognize that more may be needed to be done to address the delays and added costs, such as digitizing more of the permit process. ChargePoint recommends investing CTP funding to provide technical support and implementation services for a digitized EV charging permitting platform that could be utilized by many under resourced authorities across the state, particularly in rural or underserved communities that may be unable to meet AB 1236 without additional funding.

### **Charging Infrastructure for Medium and Heavy Duty Electric Vehicles**

ChargePoint supports the Commission's funding approach, allocations, and timelines for medium and heavy duty EV infrastructure. ChargePoint also supports leveraging the nearly \$47.5 million available for prior investment plans to support these technologies. While the block grant structure has worked well for light-duty charging through CALeVIP, we encourage the Commission to carefully consider medium and heavy duty fleet business models when crafting requirements to support this space. Program requirements that permit various business models such as leasing models should be considered in program design. In addition, ChargePoint encourages the Commission to require standards based technologies to the fullest extent possible.

### **Manufacturing**

ChargePoint appreciates the Commission's continued commitment to support advanced vehicle technology manufacturing. With the Commission's support, California has established one of the most vibrant ZEV and EV charging supply chains in the world, providing increased access to these technologies, creating jobs, and driving economic activity. ChargePoint encourages the Commission to continue its leadership in this space. ChargePoint recommends and increased, front loaded investment in

manufacturing. The state's manufacturers must increase capacity in the near term if we are to provide the technology required to meet the goals outlined in Executive Order B-48-18. With sustained volatility in the global markets it will prove difficult for the state's manufacturers and suppliers to make these critical investments alone. Some of the risk the state's manufacturers are faced with can be reduced through CTP incentive programs.

**Conclusion**

ChargePoint appreciates the opportunity to comment on the Investment Plan Update for the CTP and looks forward to a continued successful working relationship with the Commission.

Respectfully,



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ChargePoint